

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JOANNA WILSON, as Independent Administrator))	
of the Estate of AREON MARION, Deceased,)	
)	
Plaintiff,)	22-cv-06886
)	
v.)	Honorable Andrea R. Wood
)	
COOK COUNTY, ILLINOIS, et al.,)	
)	
Defendants.)	

**PLAINTIFF’S MOTION TO APPROVE SETTLEMENT OF WRONGFUL DEATH
ACTION AND TO APPROVE DISTRIBUTION OF FUNDS**

Plaintiff, JOANNA WILSON, as Independent Administrator of the Estate of AREON MARION, Deceased, by and through her attorneys, CLIFFORD LAW OFFICES, P.C., hereby moves this Court to approve a settlement of the wrongful death action in this case and for leave to accept and distribute of \$1,500,000.00 offered in settlement of the cause of actions for the Estate of AREON MARION against Defendant COOK COUNTY, ILLINOIS. In support, Plaintiff states as follows:

1. This cause of action arose from the death of Areon Marion (“Areon”) on October 31, 2021 caused by his suicide while incarcerated in the Cook County Department of Corrections. Plaintiff alleged negligence against various persons for failure to properly treat Areon to prevent suicide.

2. As a result of hanging himself, Areon was discovered unconscious and not breathing. Areon never regained consciousness and was eventually pronounced dead on October 31, 2021. There was no evidence produced in this case to demonstrate conscious pain and

suffering. Accordingly, the damages in this matter are limited to compensable wrongful death damages for grief, sorrow, and mental suffering, and loss of society for Areon's next of kin.

3. This Court referred this matter to Magistrate Judge Kim for a settlement conference, and this matter resolved on November 16, 2023 subject to the approval of the Cook County Board of Commissioners at its next meeting.

4. An offer of \$1,500,000.00 as to Defendant, Cook County, has been made to settle this matter.

5. Based upon the facts and circumstances of this case, the settlement offer of \$1,500,000.00 offered by Defendant, Cook County, is fair and reasonable, and it is recommended to the Court.

6. Plaintiff states that the proposed settlement has been fully explained to Plaintiff, Joanna Wilson, by her attorneys and that she understands its terms. *See* Affidavit of Joanna Wilson attached hereto as Exhibit A.

7. Plaintiff requests that the settlement of \$1,500,000.00 be allocated as follows:

Wrongful Death	\$1,500,000.00 (100%)
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8. Plaintiff's attorneys request attorneys' fees according to the contract between the attorneys and client in the total amount of \$600,000.00 (40% of \$1,500,000.00). Plaintiff's attorneys request that the attorneys' fees be allocated as follows:

Wrongful Death	\$600,000.00 (100%)
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9. Plaintiff and her attorneys request that the Court approve the reimbursement of reasonable and necessary expenses incurred in this litigation in the amount of \$16,602.78 attached hereto as Exhibit B and requests that the reimbursement be allocated as follows:

Wrongful Death	\$16,602.78 (100%)
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10. At the time of his death, Areon Marion, left surviving as his next of kin:

- a. Joanna Wilson, mother;
- b. Adair Joyner, father;
- c. Robert Marion, brother;
- d. Ryan Marion, brother;
- e. Amber Marion, sister;
- f. Dominic Wilson, brother; and
- g. Aiden Joyner, brother.

See Order Declaring Heirship dated September 23, 2022 attached hereto as Exhibit C.

11. Plaintiff requests that dependency be found in the following percentages as per the aforesaid and the attached Affidavit of Plaintiff Joanna Wilson:¹

Joanna Wilson, mother	99.49%
Adair Joyner, father	0%
Robert Marion, brother	0.28%
Ryan Marion, brother	0%
Amber Marion, sister	0%
Dominic Wilson, brother	0.23%
Aiden Joyner, brother	0%

12. Plaintiff requests that the settlement proceeds allocated to the Wrongful Death Count be distributed as follows per the aforesaid and the attached Affidavit of JOANNA WILSON:

\$ 1,500,000.00	(100% of gross settlement)
- \$ 600,000.00	(100% of attorney's fees)
- \$ 16,602.78	(100% of expenses)

¹ Each percentage of dependency is determined by dividing each respective next of kin's agreed dollar allocation with the net total amount of the proceeds distributable (\$883,397.22) as indicated in paragraph 12 of this Order. Each respective percentage of dependency has been rounded to two decimal places. Any difference between the distributable amounts based on the percentages in paragraph 11 from those amounts contained in paragraph 12 are attributable to rounding. Notwithstanding said rounding differences, the final and agreed amounts distributable to each next of kin in paragraph 12 is the amount which shall be distributed to each respective next of kin.

\$ 883,397.22

Plaintiff, JOANNA WILSON, as Independent Administrator of the Estate of AREON MARION, Deceased, to be distributed as follows:

Joanna Wilson	\$878,897.22
Adair Joyner	\$0.00
Robert Marion	\$2,500.00
Ryan Marion	\$0.00
Amber Marion	\$0.00
Joanna Wilson, as Guardian of Dominic Wilson, for the sole benefit of Dominic Wilson	\$2,000.00
Aiden Joyner	\$0.00

13. Plaintiff requests that the Survival Action Count is dismissed.

14. Plaintiff requests this case be dismissed with prejudice against Defendant with parties to bear their own costs. This Court shall retain jurisdiction for the purpose of enforcing the terms of settlement and adjudicating any liens.

15. The proposed settlement has been explained to Robert Marion, Ryan Marion, Amber Marion, and Adair Joyner. *See* Affidavit of Robert Marion attached hereto as Exhibit D; Affidavit of Ryan Marion attached hereto as Exhibit E; and *see* Affidavit of Amber Marion attached hereto as Exhibit F.

16. The Affidavit of James C. Pullos is attached hereto as Exhibit G.

17. Plaintiff's proposed order is attached hereto as Exhibit H.

WHEREFORE, Plaintiff, JOANNA WILSON, as Independent Administrator of the Estate of AREON MARION, Deceased, prays for entry of an order (a) approving the settlement of this case, (b) approving allocation of the settlement of the Wrongful Death Action, (c) making findings of dependency under the Wrongful Death Action, (d) dismissing the Survival Action,

(e) approving attorneys' fees and litigation expenses incurred, (f) approving distribution of settlement proceeds, and (g) dismissing this case with prejudice against Defendant with parties to bear their own costs.

Respectfully submitted,

DocuSigned by:

Joanna Wilson

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Plaintiff, JOANNA WILSON, as Independent Administrator of the
Estate of AREON MARION, Deceased

[X] Under penalties as provided by law pursuant to 28 U.S.C. § 1746, I certify under penalty of perjury that the foregoing is true and correct.

Respectfully submitted,

/s/ James C. Pullos

James C. Pullos

James C. Pullos
CLIFFORD LAW OFFICES, P.C.
120 N. LaSalle St., 36th Floor
Chicago, IL 60602
(312) 899-9090
jcp@cliffordlaw.com
Attorney for Plaintiff

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JOANNA WILSON, as Independent Administrator))	
of the Estate of AREON MARION, Deceased,)	
)	
Plaintiff,)	22-cv-06886
)	
v.)	Honorable Andrea R. Wood
)	
COOK COUNTY, ILLINOIS, et al.,)	
)	
Defendants.)	

AFFIDAVIT OF JOANNA WILSON

JOANNA WILSON, being first duly sworn under oath, states as follows:

1. I am over 18 years of age and mentally competent.
2. I am the mother of Areon Marion, who died on October 31, 2021, at the age of 22.
3. I am also the mother and guardian of Dominic Wilson, who is a minor.
4. A settlement offer from Defendant Cook County, Illinois ("Defendant") to the Plaintiff in the amount of \$1,500,000.00 has been conveyed to me by Clifford Law Offices, P.C.
5. Based upon the facts and circumstances of this case, I believe the acceptance of the total settlement offer of \$1,500,000.00 offered by Defendant in settlement of the claims on behalf of the Estate of Areon Marion, Deceased, is fair and reasonable and recommend it to the Court.
6. At the time of his death, Areon Marion, left surviving as his next of kin:
 - a. Joanna Wilson, mother;
 - b. Adair Joyner, father;
 - c. Robert Marion, brother;
 - d. Ryan Marion, brother;
 - e. Amber Marion, sister;
 - f. Dominic Wilson, brother; and
 - g. Aiden Joyner, brother.
7. As mother, I raised and cared for Areon Marion ("Areon") throughout his life until his early adulthood. Areon's adult siblings, Robert Marion, Ryan Marion, and

Amber Marion, agree to the proposed distribution. Areon's father, Adair Joyner, has not been involved in Areon's life for at least the past ten years. I was told by my son, Ryan, that Adair did not want anything from this lawsuit.

8. Areon's half-brother, Aiden Joyner, is a minor. Areon did not reside with or have any relationship with Aiden Joyner, and thus, Aiden Joyner is not able to offer evidence of his own grief, sorrow, and mental suffering, and loss of society caused by the death of Areon.
9. Areon's half-brother, Dominic Wilson, is a minor and resides with me. Dominic Wilson was an infant during Areon's life and was 5 years-old when Areon died, and because of his age, Dominic Wilson is not able to offer evidence of his own grief, sorrow, and mental suffering, and loss of society caused by the death of Areon.
10. I hereby consent, agree, and desire that the distribution of the net proceeds of the settlement under the Wrongful Death Act in the amount of \$883,397.22 shall be in accordance with the following degrees of dependency:

Name	Dependency	Amount
Joanna Wilson, mother	99.49%	\$878,897.22
Adair Joyner, father	0%	\$0.00
Robert Marion, brother	0.28%	\$2,500.00
Ryan Marion, brother	0%	\$0.00
Amber Marion, sister	0%	\$0.00
Dominic Wilson, brother	0.23%	\$2,000.00
Aiden Joyner, brother	0%	\$0.00

11. I hereby consent, agree, and desire that the Survival Action is dismissed.
12. I have read Plaintiff's Motion to Approve Settlement of Wrongful Death and to Approve Distribution of Funds, and agree and consent to all of its terms.

FURTHER AFFIANT SAYETH NAUGHT.

DocuSigned by:

Joanna Wilson

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JOANNA WILSON

- [X] Under penalties as provided by law pursuant to 28 U.S.C. § 1746, I certify under penalty of perjury that the foregoing is true and correct.

James C. Pullos
Clifford Law Offices, P.C.
120 North LaSalle Street, 36th Floor
Chicago, IL 60602
(312) 899-9090
jcp@cliffordlaw.com

EXHIBIT B

WILSON/MARION/220080

TO: CLIFFORD LAW OFFICES, P.C.,
as reimbursement of expenses incurred
during investigation and litigation of the
above-captioned matter, itemized as follows:

Court Fees

Clerk of the Circuit Court\$ 620.95
File & ServeXpress 511.38
Sheriff of Cook County 735.12

Bond

Carlisle M. Strenning & Son 100.00

Investigation

Robert G. Hanrahan Investigations5,743.19

Experts

Medical Record Summary 238.50
Peachstate Psychiatric Services5,000.00
The Expert Institute Group3,000.00

Research

Thomson Reuters-West 85.33
Law Bulletin 250.00
U.S. Courts-Pacer 3.00

Records

Ciox 233.63

Delivery Services

Federal Express 81.68

TOTAL REIMBURSABLE EXPENSES\$ 16,602.78

EXHIBIT C

□ 4103

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS COUNTY DEPARTMENT - PROBATE DIVISION

Case No. 2022P004113 Calendar 7Estate of Areon J. Marion
Deceased**ORDER DECLARING HEIRSHIP**

After considering evidence concerning heirship, the Court declares that the following are the only heirs of the decedent:

1. Joanna Wilson, mother.
2. Adair Joyner, father.
3. Ryan Marion, brother.
4. Amber Marion, sister.
4. Robert Marion, brother.
6. Dominic Wilson, brother.
7. Aiden Joyner, brother.
8. Unknown Paternal Heirs.

Attorney Number 32640
 Name James C. Pullos
 Firm Name Clifford Law Offices PC
 Attorneys for Estate
 Address 120 N. La Salle, 36th Floor
 City/State/Zip Chicago, IL 60602
 Telephone (312) 899-9090
 Email jcp@cliffordlaw.com

ENTERED:

_____, 20____

[Judge]

[Judge's number]

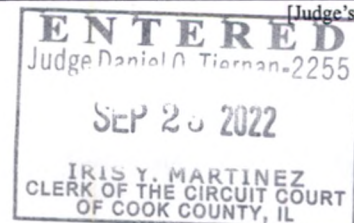


EXHIBIT D

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JOANNA WILSON, as Independent Administrator))	
of the Estate of AREON MARION, Deceased,)	
)	
Plaintiff,)	22-cv-06886
)	
v.)	Honorable Andrea R. Wood
)	
COOK COUNTY, ILLINOIS, et al.,)	
)	
Defendants.)	

AFFIDAVIT OF ROBERT MARION

ROBERT MARION, being first duly sworn under oath, states as follows:

1. I am over 18 years of age and mentally competent.
2. I am the brother of Areon Marion, who died on October 31, 2021, at the age of 22.
3. A settlement offer from Defendant Cook County, Illinois ("Defendant") to the Plaintiff in the amount of \$1,500,000.00 has been conveyed to me by Clifford Law Offices, P.C.
4. Based upon the facts and circumstances of this case, I believe the acceptance of the total settlement offer of \$1,500,000.00 offered by Defendant in settlement of the claims on behalf of the Estate of Areon Marion, Deceased, is fair and reasonable and recommend it to the Court.
5. At the time of his death, Areon Marion, left surviving as his next of kin:
 - a. Joanna Wilson, mother;
 - b. Adair Joyner, father;
 - c. Robert Marion, brother;
 - d. Ryan Marion, brother;
 - e. Amber Marion, sister;
 - f. Dominic Wilson, brother; and
 - g. Aiden Joyner, brother.
6. I hereby consent, agree, and desire that the distribution of the net proceeds of the settlement under the Wrongful Death Act in the amount of \$883,397.22 shall be in accordance with the following degrees of dependency:

Name	Dependency	Amount
Joanna Wilson, mother	99.49%	\$878,897.22
Adair Joyner, father	0%	\$0.00
Robert Marion, brother	0.28%	\$2,500.00
Ryan Marion, brother	0%	\$0.00
Amber Marion, sister	0%	\$0.00
Dominic Wilson, brother	0.23%	\$2,000.00
Aiden Joyner, brother	0%	\$0.00

7. I hereby consent, agree, and desire that the Survival Action is dismissed.
8. I have read Plaintiff's Motion to Approve Settlement of Wrongful Death and to Approve Distribution of Funds, and agree and consent to all of its terms.

FURTHER AFFIANT SAYETH NAUGHT.

DocuSigned by:



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ROBERT MARION

[X] Under penalties as provided by law pursuant to 28 U.S.C. § 1746, I certify under penalty of perjury that the foregoing is true and correct.

James C. Pullos
Clifford Law Offices, P.C.
120 North LaSalle Street, 36th Floor
Chicago, IL 60602
(312) 899-9090
jcp@cliffordlaw.com

EXHIBIT E

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JOANNA WILSON, as Independent Administrator))	
of the Estate of AREON MARION, Deceased,)	
)	
Plaintiff,)	22-cv-06886
)	
v.)	Honorable Andrea R. Wood
)	
COOK COUNTY, ILLINOIS, et al.,)	
)	
Defendants.)	

AFFIDAVIT OF RYAN MARION

RYAN MARION, being first duly sworn under oath, states as follows:

1. I am over 18 years of age and mentally competent.
2. I am the brother of Areon Marion, who died on October 31, 2021, at the age of 22.
3. A settlement offer from Defendant Cook County, Illinois ("Defendant") to the Plaintiff in the amount of \$1,500,000.00 has been conveyed to me by Clifford Law Offices, P.C.
4. Based upon the facts and circumstances of this case, I believe the acceptance of the total settlement offer of \$1,500,000.00 offered by Defendant in settlement of the claims on behalf of the Estate of Areon Marion, Deceased, is fair and reasonable and recommend it to the Court.
5. At the time of his death, Areon Marion, left surviving as his next of kin:
 - a. Joanna Wilson, mother;
 - b. Adair Joyner, father;
 - c. Robert Marion, brother;
 - d. Ryan Marion, brother;
 - e. Amber Marion, sister;
 - f. Dominic Wilson, brother; and
 - g. Aiden Joyner, brother.
6. I hereby consent, agree, and desire that the distribution of the net proceeds of the settlement under the Wrongful Death Act in the amount of \$883,397.22 shall be in accordance with the following degrees of dependency:

Name	Dependency	Amount
Joanna Wilson, mother	99.49%	\$878,897.22
Adair Joyner, father	0%	\$0.00
Robert Marion, brother	0.28%	\$2,500.00
Ryan Marion, brother	0%	\$0.00
Amber Marion, sister	0%	\$0.00
Dominic Wilson, brother	0.23%	\$2,000.00
Aiden Joyner, brother	0%	\$0.00

7. I hereby consent, agree, and desire that the Survival Action is dismissed.
8. I have read Plaintiff's Motion to Approve Settlement of Wrongful Death and to Approve Distribution of Funds, and agree and consent to all of its terms.

FURTHER AFFIANT SAYETH NAUGHT.

DocuSigned by:

Ryan Marion

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RYAN MARION

- [X] Under penalties as provided by law pursuant to 28 U.S.C. § 1746, I certify under penalty of perjury that the foregoing is true and correct.

James C. Pullos
Clifford Law Offices, P.C.
120 North LaSalle Street, 36th Floor
Chicago, IL 60602
(312) 899-9090
jcp@cliffordlaw.com

EXHIBIT F

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JOANNA WILSON, as Independent Administrator))	
of the Estate of AREON MARION, Deceased,)	
)	
Plaintiff,)	22-cv-06886
)	
v.)	Honorable Andrea R. Wood
)	
COOK COUNTY, ILLINOIS, et al.,)	
)	
Defendants.)	

AFFIDAVIT OF AMBER MARION

AMBER MARION, being first duly sworn under oath, states as follows:

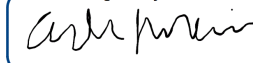
1. I am over 18 years of age and mentally competent.
2. I am the sister of Areon Marion, who died on October 31, 2021, at the age of 22.
3. A settlement offer from Defendant Cook County, Illinois ("Defendant") to the Plaintiff in the amount of \$1,500,000.00 has been conveyed to me by Clifford Law Offices, P.C.
4. Based upon the facts and circumstances of this case, I believe the acceptance of the total settlement offer of \$1,500,000.00 offered by Defendant in settlement of the claims on behalf of the Estate of Areon Marion, Deceased, is fair and reasonable and recommend it to the Court.
5. At the time of his death, Areon Marion, left surviving as his next of kin:
 - a. Joanna Wilson, mother;
 - b. Adair Joyner, father;
 - c. Robert Marion, brother;
 - d. Ryan Marion, brother;
 - e. Amber Marion, sister;
 - f. Dominic Wilson, brother; and
 - g. Aiden Joyner, brother.
6. I hereby consent, agree, and desire that the distribution of the net proceeds of the settlement under the Wrongful Death Act in the amount of \$883,397.22 shall be in accordance with the following degrees of dependency:

Name	Dependency	Amount
Joanna Wilson, mother	99.49%	\$878,897.22
Adair Joyner, father	0%	\$0.00
Robert Marion, brother	0.28%	\$2,500.00
Ryan Marion, brother	0%	\$0.00
Amber Marion, sister	0%	\$0.00
Dominic Wilson, brother	0.23%	\$2,000.00
Aiden Joyner, brother	0%	\$0.00

7. I hereby consent, agree, and desire that the Survival Action is dismissed.
8. I have read Plaintiff's Motion to Approve Settlement of Wrongful Death and to Approve Distribution of Funds, and agree and consent to all of its terms.

FURTHER AFFIANT SAYETH NAUGHT.

DocuSigned by:



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AMBER MARION

[X] Under penalties as provided by law pursuant to 28 U.S.C. § 1746, I certify under penalty of perjury that the foregoing is true and correct.

James C. Pullos
 Clifford Law Offices, P.C.
 120 North LaSalle Street, 36th Floor
 Chicago, IL 60602
 (312) 899-9090
jcp@cliffordlaw.com

EXHIBIT G

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JOANNA WILSON, as Independent Administrator))	
of the Estate of AREON MARION, Deceased,)	
)	
Plaintiff,)	22-cv-06886
)	
v.)	Honorable Andrea R. Wood
)	
COOK COUNTY, ILLINOIS, et al.,)	
)	
Defendants.)	

AFFIDAVIT OF JAMES C. PULLOS

JAMES C. PULLOS, being first duly sworn under oath, states as follows:

1. That I am an attorney for Plaintiff, JOANNA WILSON, as Independent Administrator of the Estate of AREON MARION, Deceased, and that I prepared and read the petition for settlement of claims for wrongful death and that the same is true and correct in substance and effect of this my knowledge and belief. Based on my knowledge of this matter and all the facts and circumstances surrounding it, the settlement offer detailed in the petition is fair and reasonable and I recommend its approval to this Honorable Court.

2. In my opinion, based upon handling numerous negligence case to conclusion by settlement or verdict in a knowledge of the settlement value of, and verdicts, and similar cases, the settlement is in the range of reported settlements or verdicts.

FURTHER AFFIANT SAYETH NAUGHT.

/s/ James C. Pullos
James C. Pullos

[X] Under penalties as provided by law pursuant to 28 U.S.C. § 1746, I certify under penalty of perjury that the foregoing is true and correct.

James C. Pullos
CLIFFORD LAW OFFICES, P.C.
120 North LaSalle Street, 36th Floor
Chicago, IL 60602
(312) 899-9090
jcp@cliffordlaw.com

EXHIBIT H

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JOANNA WILSON, as Independent Administrator))	
of the Estate of AREON MARION, Deceased,)	
)	
Plaintiff,)	22-cv-06886
)	
v.)	Honorable Andrea R. Wood
)	
COOK COUNTY, ILLINOIS, et al.,)	
)	
Defendants.)	

ORDER

THIS CAUSE COMING ON TO BE HEARD on the Motion to Approve Settlement of Wrongful Death Action and to Approve Distribution of Funds filed by Plaintiff, JOANNA WILSON, as Independent Administrator of the Estate of AREON MARION, Deceased, due notice having been given, and the Court having reviewed Plaintiff's Motion to Approve Settlement of Wrongful Death Action and to Approve Distribution of Funds, and other documents submitted *in camera*, and being fully advised in the premises;

IT IS HEREBY ORDERED THAT:

1. The settlement amount of \$1,500,000.00 is fair and reasonable and is approved.
2. The settlement of \$1,500,000.00 is allocated as follows:

Wrongful Death	\$1,500,000.00 (100%)
----------------	-----------------------
3. The attorneys for the Plaintiff are entitled to fees in the amount of \$600,000.00 (40% of \$1,500,000.00) and shall be allocated as follows:

Wrongful Death	\$600,000.00 (100%)
----------------	---------------------
4. Plaintiff's attorneys are entitled to reimbursement for reasonable and necessary expenses attributable to the lawsuit in the amount of \$16,602.78 shall be allocated as follows:

Wrongful Death	\$16,602.78 (100%)
----------------	--------------------

5. The next of kin of the decedent under the Wrongful Death Count and the percentages of dependency are:¹

Joanna Wilson, mother	99.49%
Adair Joyner, father	0%
Robert Marion, brother	0.28%
Ryan Marion, brother	0%
Amber Marion, sister	0%
Dominic Wilson, brother	0.23%
Aiden Joyner, brother	0%

6. The settlement amount allocated to the Wrongful Death Count is to be distributed in accordance with the above findings and percentages of dependency as follows:

\$ 1,500,000.00 (100% of gross settlement)

- \$ 600,000.00 (100% of attorney's fees)

- \$ 16,602.78 (100% of expenses)

\$ 883,397.22 Plaintiff, JOANNA WILSON, as Independent
Administrator of the Estate of AREON MARION,
Deceased, to be distributed as follows:

Joanna Wilson	\$878,897.22
Adair Joyner	\$0.00
Robert Marion	\$2,500.00
Ryan Marion	\$0.00
Amber Marion	\$0.00
Joanna Wilson, as Guardian of Dominic Wilson, for the sole benefit of Dominic Wilson	\$2,000.00
Aiden Joyner	\$0.00

1 Each percentage of dependency is determined by dividing each respective next of kin's agreed dollar allocation with the net total amount of the proceeds distributable (\$883,397.22) as indicated in paragraph 6 of this Order. Each respective percentage of dependency has been rounded to two decimal places. Any difference between the distributable amounts based on the percentages in paragraph 5 from those amounts contained in paragraph 6 are attributable to rounding. Notwithstanding said rounding differences, the final and agreed amounts distributable to each next of kin in paragraph 6 is the amount which shall be distributed to each respective next of kin.

7. The Survival Action Count is dismissed.

8. Defendant Cook County, Illinois is dismissed with prejudice with parties to bear their own costs.

IT IS FURTHER ORDERED that the amount distributable, based on dependency, shall be accounted for and administered in the Probate Division of Cook County, Illinois and that the amount distributable to the representative appointed by the probate division as an asset of the decedent's estate or for distribution under the Wrongful Death Act shall be paid only upon the presentation of an order entered in the Probate Division authorizing the representative to receive the distributable amount and approving the bond or other security required in connection therewith.

IT IS FURTHER ORDERED that this court retains jurisdiction to enter any further orders necessary to effectuate and enforce this settlement or adjudicate any liens.

Judge Andrea R. Wood

Prepared by:
James C. Pullos
CLIFFORD LAW OFFICES, P.C.
120 N. LaSalle Street, 36th Floor
Chicago, Illinois 60602
(312) 899-9090
jcp@cliffordlaw.com
Attorney for Plaintiff